

Joshua B. Swigart, Esq. (SBN: 225557)
josh@westcoastlitigation.com
Robert L. Hyde, Esq. (SBN: 227183)
bob@westcoastlitigation.com
HYDE & SWIGART
411 Camino Del Rio South, Suite 301
San Diego, CA 92108-3551
Telephone: (619) 233-7770
Facsimile: (619) 297-1022

Attorneys for Richard Hadsell

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

Richard Hadsell,

Plaintiff,

v.

CACH and Mandarich Law Group,
LLP,

Defendants.

Case No: 12-CV 0235 L RBB

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR
PARTIAL SUMMARY
JUDGMENT AGAINST ALL
DEFENDANTS**

Date: April 29, 2013

Time: 10:30 AM

Courtroom 5B

Judge: Hon. M. James Lorenz

HYDE & SWIGART
San Diego, California

To: All Interested Parties and their Attorneys of Record:

NOTICE IS HEREBY GIVEN that on April 29, 2013, or as soon thereafter as the matter may be heard, Plaintiff will move this Court located at 940 Front Street, San Diego, CA 92101-8900, Courtroom: 5B, for an order granting partial summary judgement in favor of the plaintiff against both Defendants, pursuant to Federal Rules of civil Procedure, Rule 56(b), on the grounds that this action is meritorious and there is no triable issue as to any material fact and defendant is entitled to judgment as a matter of law.

This motion is based upon this Notice, the records and papers on file herein, the attached Memorandum of Points and Authorities, the Declaration of Joshua B. Swigart and all corresponding exhibits, the Declaration of Plaintiff and all corresponding exhibits, and on such other evidence as may be presented at the hearing of this motion.

Respectfully Submitted,

Hyde & Swigart

Date: March 12, 2013

By: /s Joshua B. Swigart
Joshua B. Swigart
Attorneys for Plaintiff

HYDE & SWIGART
San Diego, California